

Please submit to the court docket sheet by May 26, 2025.

I have signed with the /S/.

May 25, 2025

John Sotomayor  
2359 Maple Ave.  
Cortlandt Manor, NY 10567  
[Jhnsot@gmail.com](mailto:Jhnsot@gmail.com)  
917-887-2223

**Case - Docket Number - 2021-cv-07161**

Please find below supporting documentation for illustrating the Rule 60 for Standing. I have been told Standing can be raised at any time to show the Plaintiff's inability to prove they maintained the actual file of payments and history of the loan. This also Statute of limitations back into the front of this file. Below you will find an email where the old servicer was attempting to contact me and stated they submitted a demand letter in April of 2013. It also states the case was not started 6/8/2019 when I was served by Sean Daniels, a process server. There fore the statute of limitations is in effect.

Also attached is more supporting documentation of the plaintiffs' lies and how they don't have the data of this mortgage. It is Yonel Davico's affidavit which it was sworn to, that shows and states I made my last payment in 2009. It actually shows a spreadsheet of my payments. The information and data are a farce, lie. As documented in the partners and payment relief file and maybe go back to the wells fargo file I made my last Payment in October of 2008.

There are other examples but these 2 should show the court truly needs to vacate this judgement due to **NEWLY DISCOVERED EVIDENCE.**

Also the file submitted to court shows a number of instances Plaintiff is attempting to collect on the state case. This is also somewhat deceptive and possibly illegal.

John Sotomayor /s/

**From:** Juli Robinson <jrobinson@partnersforpaymentrelief.com>  
**Date:** December 18, 2013 at 9:49:52 AM EST  
**To:** JS-H <johnsotomayor@verizon.net>  
**Subject:** RE: 2nd Mortgage with Partners for Payment Relief

John,

We originally talked on May30th 2013 and we discussed doing a financial statement over the phone to see what you can afford. I left several messages in June, July and August trying to reach you then the # we have on file stopped accepting calls. Legal reviewed the file and then sent you a demand letter because we received no responses and has been moving forward with foreclosure. I am still here to help figure something out. We can do a financial statement over the phone. It takes about 10 minutes and then I will need you to fax or email me your 2011, 2012 tax returns, 2 months of current bank statements and 2 paystubs for all the income earners in the house. Can you give me a call and we can do the financial statement and get started on seeing what we can do for you. Please let me know.

Thanks,

*Juli Robinson*

Partners for Payment Relief, LLC  
3748 West Chester Pike, Suite 103  
Newtown Square, PA 19073  
[jrobinson@partnersforpaymentrelief.com](mailto:jrobinson@partnersforpaymentrelief.com)  
P-888-879-4997 Ext 109  
F -888-700-4988

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**From:** JS-H [mailto:johnsotomayor@verizon.net]  
**Sent:** Tuesday, December 17, 2013 11:46 PM  
**To:** Juli Robinson  
**Subject:** Re: 2nd Mortgage with Partners for Payment Relief

I have checked all the paperwork your firm has sent me since you purchased the loan from the last company. Not at any time has your firm made me an offer to re finance the loan. All the paperwork you have sent has been for foreclosure. Not a single offer sent to place the loan on track. Not a reinstatement offer. The first letter sent to me were options to move out. It would seem your firm purchased this loan with the expectation of foreclose Not with the intention to assist or work with the home owner.

I would like to be sent any paperwork on how we can fix this issue. I am open and willing to work at reasonable expectations keeping my home. Pleas let me know

Sent from my iPad 2013

## Pay History

Loan Number : 91600040110	
John Sotomayor Maple Avenue Manor, New York 10567	2359 Cortlandt

Due Date	Paid Date	Principal	Monthly Payment Due
	01/19/2007	\$ 104,375.00	
03/05/2007	03/05/2007	\$ 104,323.66	\$ 881.64
04/05/2007	04/05/2007	\$ 104,271.92	\$ 881.64
05/05/2007	05/05/2007	\$ 104,219.77	\$ 881.64
06/05/2007	06/05/2007	\$ 104,167.20	\$ 881.64
07/05/2007	07/05/2007	\$ 104,114.22	\$ 881.64
08/05/2007	08/05/2007	\$ 104,060.82	\$ 881.64
09/05/2007	09/05/2007	\$ 104,006.99	\$ 881.64
10/05/2007	10/05/2007	\$ 103,952.74	\$ 881.64
11/05/2007	11/05/2007	\$ 103,898.06	\$ 881.64
12/05/2007	12/05/2007	\$ 103,842.95	\$ 881.64
01/05/2008	01/05/2008	\$ 103,787.40	\$ 881.64
02/05/2008	02/05/2008	\$ 103,731.41	\$ 881.64
03/05/2008	03/05/2008	\$ 103,674.98	\$ 881.64
04/05/2008	04/05/2008	\$ 103,618.10	\$ 881.64
05/05/2008	05/05/2008	\$ 103,560.77	\$ 881.64
06/05/2008	06/05/2008	\$ 103,502.99	\$ 881.64
07/05/2008	07/05/2008	\$ 103,444.75	\$ 881.64
08/05/2008	08/05/2008	\$ 103,386.05	\$ 881.64
09/05/2008	09/05/2008	\$ 103,326.88	\$ 881.64
10/05/2008	10/05/2008	\$ 103,267.24	\$ 881.64
11/05/2008	11/05/2008	\$ 103,207.13	\$ 881.64
12/05/2008	12/05/2008	\$ 103,146.55	\$ 881.64
01/05/2009	01/05/2009	\$ 103,085.49	\$ 881.64
02/05/2009	02/05/2009	\$ 103,023.94	\$ 881.64
03/05/2009	03/05/2009	\$ 102,961.91	\$ 881.64
04/05/2009	04/05/2009	\$ 102,899.39	\$ 881.64
05/05/2009	05/05/2009	\$ 102,836.37	\$ 881.64
06/05/2009	06/05/2009	\$ 102,772.85	\$ 881.64
07/05/2009	07/05/2009	\$ 102,708.83	\$ 881.64
08/05/2009	08/05/2009	\$ 102,644.30	\$ 881.64
09/05/2009	09/05/2009	\$ 102,579.26	\$ 881.64
10/05/2009	10/05/2009	\$ 102,513.71	\$ 881.64
11/05/2009	11/05/2009	\$ 102,447.64	\$ 881.64
12/05/2009	12/05/2009	\$ 102,375.00	\$ 881.64
01/05/2010		\$ 102,375.00	\$ 881.64
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